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April 16, 2021

Via ECF

Hon. Ronnie Abrams, USDJ United States District Court, SDNY 40 Foley Square, Courtroom: 1506 New York, NY 10007

Tel: 212-805-0162

Re: Chevalier v. Staffpro, Inc. et al
Case No. 20-CV-07006 (RA)(BCM)
Motion for Extension of Time

Dear Judge Abrams:

My firm represents plaintiff Nathanael Chevalier ("Plaintiff") in the above-referenced action, and I respectfully write to seek a brief one-week extension of the deadline for the parties to submit a revised settlement agreement. This request is being made because despite some progress, the parties still need additional time to craft release language that complies with Your Honor's order. We tried very hard to avoid having to make this request and do not anticipate the need for any further extensions – if the parties cannot agree within the next week, we will notify the Court accordingly. Three prior requests for an extension of this deadline were made and granted.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq. (AH6510)

Counsel for Plaintiff

cc: Defense Counsel via ECF

Application granted. Further extensions will be granted only upon a showing of good cause.

SO ORDERED.

Hon. Ronnie Abrams

04/19/2021